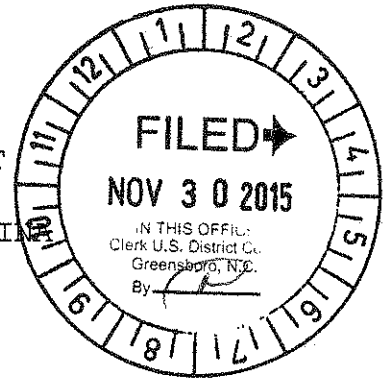


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA

v.

TIGER [NMN] CELA

1:15CR 395-1

The Grand Jury Charges:

COUNT ONE

1. At all times material herein, TIGER [NMN] CELA was a citizen of the Republic of Albania residing in the United States, in the County of Forsyth, in the Middle District of North Carolina.

2. At all times material herein, Wells Fargo Bank, N.A., and all of its branches were financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

3. At all times material herein, NewBridge Bank, N.A., and all of its branches were financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

4. At all times material herein, First Community Bank and all its branches were financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

5. At all times material herein, an individual whose initials are S.M. was a resident of the State of Michigan.

6. From on or about March 1, 2012, continuing up to and including on or about May 1, 2012, the exact dates to the Grand Jurors unknown, in the County of Forsyth, in the Middle District of North Carolina, and elsewhere, TIGER [NMN] CELA and other persons, both known and unknown to the Grand Jurors, did knowingly execute and attempt to execute a scheme and artifice to obtain money, funds, and property under the custody and control of financial institutions, that is, Wells Fargo Bank, N.A., NewBridge Bank, N.A., and First Community Bank, by means of materially false and fraudulent pretenses, representations, and promises by adopting the identity of an individual whose initials are S.M., opening a bank account with NewBridge Bank, N.A., in the assumed name of S.M., obtaining official NewBridge Bank, N.A., checks in small amounts made payable to business and utility entities, altering and counterfeiting the official checks to be payable to S.M. in large amounts, and then depositing the counterfeit and forged checks into accounts at other financial institutions, including Wells Fargo Bank, N.A., in the name of S.M. for the purpose of withdrawing the fraudulently obtained funds and converting them to the use of TIGER [NMN] CELA and other persons.

METHODS AND MEANS

7. It was a part of the scheme and artifice to defraud that TIGER [NMN] CELA obtained the identifying information of S.M. so as to assume the identity of S.M. for the purposes of fraudulently obtaining money and credit from financial institutions.

8. It was a further part of the scheme and artifice to defraud that TIGER [NMN] CELA traveled to the State of Missouri to fraudulently obtain a Missouri driver's license in the name of S.M.

9. It was a further part of the scheme and artifice to defraud that TIGER [NMN] CELA presented himself as S.M. to the Missouri Department of Motor Vehicles and obtained a Missouri driver's license in the name of S.M., but bearing the picture of TIGER [NMN] CELA.

10. It was a further part of the scheme and artifice to defraud that, on or about March 27, 2012, TIGER [NMN] CELA travelled to the State of Missouri to renew the Missouri driver's license in the name of S.M.

11. It was a further part of the scheme and artifice to defraud that, on or about March 28 or 29, 2012, TIGER [NMN] CELA opened four Wells Fargo Bank, N.A., bank accounts at the Wells Fargo Bank, N.A., branch located in Clemmons, North Carolina. TIGER [NMN] CELA presented himself to branch employees as S.M.

and opened two accounts in the name of S.M. TIGER [NMN] CELA also opened two accounts in the name of a fictitious business known as "Sam Cleaning," with TIGER [NMN] CELA falsely representing himself to be S.M., the sole owner of "Sam Cleaning."

12. It was a further part of the scheme and artifice to defraud that, on or about March 30, 2012, TIGER [NMN] CELA opened a NewBridge Bank, N.A., account at a Winston-Salem branch. TIGER [NMN] CELA represented himself to branch employees as being S.M. and presented the branch employees with a fraudulent Missouri driver's license in the name of S.M., as well as providing S.M.'s date of birth and Social Security number as means of identification.

13. It was a further part of the scheme and artifice to defraud that TIGER [NMN] CELA, representing himself as S.M., purchased approximately fourteen NewBridge Bank, N.A., official checks in amounts ranging from \$18.00 to \$33.00, made payable to companies such as Duke Energy, DIRECTV, and AT&T, it appearing the checks were being purchased to pay such bills.

14. It was a further part of the scheme and artifice to defraud that, TIGER [NMN] CELA falsely and fraudulently altered, changed and counterfeited the NewBridge Bank, N.A., official checks so as to change the amount of the checks, the payee, and

the remitter, but retaining the original NewBridge Bank, N.A., check number.

15. It was a further part of the scheme and artifice to defraud that, on or about March 30, 2012, TIGER [NMN] CELA, posing as S.M., purchased a NewBridge Bank, N.A., official check made payable to "TMWC." TIGER [NMN] CELA, and others, both known and unknown to the Grand Jurors, altered, changed, and counterfeited the NewBridge Bank, N.A., official check so that the check was then made payable to S.M. in a larger amount.

16. It was a further part of the scheme and artifice to defraud that, on or about March 30, 2012, TIGER [NMN] CELA, posing as S.M., purchased a NewBridge Bank, N.A., official check made payable to "Sam Cleaning." TIGER [NMN] CELA, and others, both known and unknown to the Grand Jurors, altered, changed, and counterfeited the NewBridge Bank, N.A., official check so that the check was then made payable to S.M. in a larger amount.

17. It was a further part of the scheme and artifice to defraud that TIGER [NMN] CELA, posing as S.M., purchased a NewBridge Bank, N.A., official check made payable to "Davidson Water." TIGER [NMN] CELA, and others, both known and unknown to the Grand Jurors, altered, changed, and counterfeited the NewBridge Bank, N.A., official check so that the check was then made payable to S.M. in a larger amount.

18. It was a further part of the scheme and artifice to defraud that, on or about April 12, 2012, TIGER [NMN] CELA deposited a counterfeited NewBridge Bank, N.A., official check made payable to S.M. at a Wells Fargo Bank, N.A., ATM located in Clemmons, Forsyth County, North Carolina, and into a Wells Fargo Bank, N.A., account in the name of S.M. and "Sam Cleaning," which account had been falsely and fraudulently opened by TIGER [NMN] CELA posing as S.M.

19. It was a further part of the scheme and artifice to defraud that TIGER [NMN] CELA transferred money from a fraudulent NewBridge Bank, N.A., official check from one Wells Fargo Bank, N.A., account into another Wells Fargo Bank, N.A., account, which TIGER [NMN] CELA had opened in the name of S.M. to facilitate the fraudulent conversion of such funds for the benefit of TIGER [NMN] CELA.

20. It was a further part of the scheme and artifice to defraud that, from on or about April 13, 2012, continuing up to and including on or about April 19, 2012, the exact date to the Grand Jurors unknown, TIGER [NMN] CELA falsely and fraudulently withdrew and converted to his own use the funds deposited by a counterfeited NewBridge Bank, N.A., official check by counter withdrawals, ATM withdrawals, and debit card purchases.

21. It was a further part of the scheme and artifice to defraud that on or about April 16, 2012, TIGER [NMN] CELA

deposited the counterfeited NewBridge Bank, N.A., official check made payable to S.M., at the Wells Fargo, N.A., ATM at the Oak Summit Branch in Winston-Salem, Forsyth County, North Carolina, and into a Wells Fargo Bank, N.A., account in the name of S.M. and "Sam Cleaning," which account had been falsely and fraudulently opened by TIGER [NMN] CELA posing as S.M.

22. It was a further part of the scheme and artifice to defraud that, on or about April 12, 2012, TIGER [NMN] CELA opened an account at First Community Bank branch located in Winston-Salem, Forsyth County, North Carolina, in the assumed and fictitious of S.M.

23. It was a further part of the scheme and artifice to defraud that, on or about April 13, 2012, TIGER [NMN] CELA deposited a counterfeit NewBridge Bank, N.A., official check made payable to S.M. into the First Community Bank account opened by TIGER [NMN] CELA in the name of S.M.

EXECUTION

24. On or about April 12, 2012, in the County of Forsyth, in the Middle District of North Carolina, TIGER [NMN] CELA did knowingly execute and attempt to execute a scheme and artifice to obtain money, funds, and property owned and controlled by financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, that is, Wells Fargo Bank, N.A., by means of materially false and fraudulent

pretenses, representations, and promises, by depositing into Wells Fargo Bank, N.A., account number 3601, in the name of an individual whose initials are S.M. and business name "Sam Cleaning," a falsely altered and counterfeited NewBridge Bank, N.A., official check number 0082708 made payable to S.M. in the amount of \$76,400.00, when in truth and in fact, as TIGER [NMN] CELA then well knew, NewBridge Bank, N.A., official check number 0082708 had been altered and counterfeited, TIGER [NMN] CELA had assumed the identity of S.M. for the purposes of obtaining money from Wells Fargo Bank, N.A., and TIGER [NMN] CELA was not entitled to receive any monies on NewBridge Bank, N.A., official check number 0082708; in violation of Title 18, United States Code, Section 1344(2).

COUNT TWO

On or about April 12, 2012, in the County of Forsyth, in the Middle District of North Carolina, TIGER [NMN] CELA, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: bank fraud, in violation of Title 18, United States Code, Section 1344(2), as alleged in Count One and incorporated by reference herein, knowingly possessed and used, without lawful authority, means of identification of another person, that is, the name and Social Security number of an individual whose initials are S.M.; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT THREE

1. The Grand Jurors reallege and incorporate paragraphs 1 through 23 of Count One as if set forth fully herein.

2. On or about April 16, 2012, in the County of Forsyth, in the Middle District of North Carolina, TIGER [NMN] CELA did knowingly execute and attempt to execute a scheme and artifice to obtain money, funds, and property owned and controlled by financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, that is, Wells Fargo Bank, N.A., by means of materially false and fraudulent pretenses, representations, and promises, by withdrawing \$16,320.00 in cash from Wells Fargo Bank, N.A., account number

2494 in the name of an individual whose initials are S.M., by posing as S.M. and preparing and presenting a withdrawal slip in the name of S.M., when in truth and in fact, as TIGER [NMN] CELA then well knew, the balance in account number 2494 had been created as the result of a fraudulent deposit made by TIGER [NMN] CELA from NewBridge Bank, N.A., official check 0082708, which had been altered and counterfeited, TIGER [NMN] CELA had assumed the identity of S.M. for the purposes of obtaining money from Wells Fargo Bank, N.A., and TIGER [NMN] CELA was not entitled to obtain any money from account number 2494; in violation of Title 18, United States Code, Section 1344(2).

COUNT FOUR

On or about April 16, 2012, in the County of Forsyth, in the Middle District of North Carolina, TIGER [NMN] CELA, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: bank fraud, in violation of Title 18, United States Code, Section 1344(2), as alleged in Count Three and incorporated by reference herein, knowingly possessed and used, without lawful authority, means of identification of another person, that is, the name and Social Security number of an individual whose initials are S.M.; in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FIVE

1. The Grand Jurors reallege and incorporate paragraphs 1 through 23 of Count One as if set forth fully herein.

2. On or about April 16, 2012, in the County of Forsyth, in the Middle District of North Carolina, TIGER [NMN] CELA did knowingly execute and attempt to execute a scheme and artifice to obtain money, funds, and property owned and controlled by financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, that is, Wells Fargo Bank, N.A., by means of materially false and fraudulent pretenses, representations, and promises, by depositing into Wells Fargo Bank, N.A., account number 3601 in the name of an individual whose initials are S.M. and business name "Sam


Cleaning," a falsely altered and counterfeited NewBridge Bank, N.A., official check number 104769 made payable to S.M. in the amount of \$160,000.00, when in truth and in fact, as TIGER [NMN] CELA then well knew, NewBridge Bank, N.A., official check 104679 had been altered and counterfeited, TIGER [NMN] CELA had assumed the identity of S.M. for the purposes of obtaining money from Wells Fargo Bank, N.A., and TIGER [NMN] CELA was not entitled to receive any money from NewBridge Bank, N.A., official check number 104679; in violation of Title 18, United States Code, Section 1344(2).

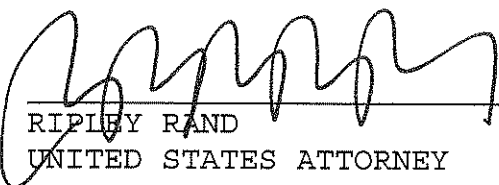
COUNT SIX

On or about April 16, 2012, in the County of Forsyth, in the Middle District of North Carolina, TIGER [NMN] CELA, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: bank fraud, in violation of Title 18, United States Code, Section 1344(2), as alleged in Count Five and incorporated by reference herein, knowingly possessed and used, without lawful authority, means of identification of another person, that is, the name and Social

Security number of an individual whose initials are S.M.; in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL:



FRANK J. CHUT, JR.
ASSISTANT UNITED STATES ATTORNEY

RIPLEY RAND
UNITED STATES ATTORNEY